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May 15, 2020

By ECF & Email (RomanNYSDChambers@nysd.uscourts.gov)

The Honorable Nelson S. Román U.S. District Judge The Hon. Charles L. Brieant Jr. Federal Building and United States Courthouse 300 Quarropas Street White Plains, NY 10601-4150 Nelson S. Roman, U.S.D.J.

Dated: May 18, 2020

White Plains, New York 10601

Application previously granted. (See ECF No. 80.) Clerk of the Court requested to terminate the motion (ECF No. 76).

Re: United States v. Willie Sims, et al., 19 Cr. 857 (NSR)

Dear Judge Román:

On behalf of all defense counsel in the above-referenced matter, I respectfully request that the Court adjourn the motion schedule in this case by two weeks. The reason for the request is the need, on the undersigned's behalf, to review recently-produced discovery and, for the other defense counsel, the press of other business including the need to prepare applications in other matters for compassionate release due to COVID-19.

Motions are currently due next Friday, May 22, 2020. If the Court grants this application, the motion schedule would be adjusted as follows: Defendants' pretrial motions, if any, would be due June 5, 2020; the government's response would be due July 13, 2020; and replies would be due July 29, 2020.

The next status conference is currently scheduled for August 7, 2020 at 11:30am. Earlier today, I exchanged emails with Assistant U.S. Attorney Shiva Logarajah, who indicated that the government has no objection to this application.

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DATE FILED: 5/18/2020

Respectfully submitted,

/s/ J.P.F.

Joseph P. Facciponti

cc: All counsel of record (by ECF and email)

New York Virginia

Washington, D.C.